

1 PAUL C. RAY, ESQ.  
Nevada Bar No. 4365  
2 PAUL C. RAY, CHTD.  
8670 West Cheyenne Avenue, Suite 130  
3 Las Vegas, NV 89129  
Telephone: (702) 823-2292  
4 Facsimile: (702) 823-2384  
Email: [paulcraylaw@gmail.com](mailto:paulcraylaw@gmail.com)  
5

6 Attorneys for Windmill Farms, Inc.

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 AMTRUST INTERNATIONAL  
10 UNDERWRITES, DAC, f/k/a AMTRUST  
INTERNATIONAL UNDERWRITERS,  
11 LIMITED,

12 Plaintiff,

13 vs.

14 CLIFFORD J. FINDLAY and DONNA SUE  
FINDLAY, individually and as Trustees, CLIFF  
15 FINDLAY AND DONNA S. FINDLAY  
FAMILY TRUST, DATED FEBRUARY 20,  
16 1986; FINDLAY MANAGEMENT GROUP;  
FINDLAY-NOLTE AUTOMOTIVE, LLC;  
17 CLIFF FINDLAY AUTOMOTIVE, LLC;  
FINDLAY AUTO HOLDINGS, LLC; CLIFF  
18 FINDLAY AUTO CENTER; TYLER CORDER;  
AND WINDMILL FARMS, INC.,  
19

20 Defendant.

Case No. 2:18-cv-00652-JCM-VCF

**JOINT MOTION TO EXTEND TIME  
FOR DEFENDANT WINDMILL  
FARMS, INC. TO ANSWER  
COMPLAINT**

**(SECOND REQUEST)**

21 Amtrust International Underwrites, Limited and Windmill Farms, Inc. by and through  
22 their undersigned respective counsels of record, file this JOINT MOTION TO EXTEND TIME  
23 FOR DEFENDANT WINDMILL FARMS, INC. TO ANSWER COMPLAINT  
24 (SECOND REQUEST) pursuant to Local Rule 6-1.

25 Windmill Farms, Inc.'s Answer and/or Response to the Complaint is presently scheduled  
26 to be due July 14, 2018 by the Court's June 28, 2018 order at (22). The underlying state court  
27 case, Case No. A-16-735002-B, in the Eighth Judicial District Court, Clark County, Nevada, is  
28

1 scheduled for decision by the Honorable Nancy L. Allf upon submitted Findings of Fact,  
2 Conclusions of Law and objections thereto on July 24, 2018 and for entry of judgment the  
3 following week.

4 To allow the parties to determine which, if any parties pertaining to the underlying state  
5 court case will remain in this case, the parties jointly move to allow Windmill farms, Inc. and  
6 additional 30 days to file its answer or to otherwise plead in response to the complaint. This is  
7 the second request for extension of time.

8 DATED this 10<sup>th</sup> day of July, 2018.

9 PAUL C. RAY, CHTD.

10 BY: /s/ Paul C. Ray  
11 PAUL C. RAY, ESQ., NV Bar No. 4365  
12 8670 W. Cheyenne Avenue, Suite 130  
13 Las Vegas, NV 89129  
14 Telephone: 702.823.2292  
Facsimile: 702.823.2384  
Email: [paulcraylaw@gmail.com](mailto:paulcraylaw@gmail.com)

15 *Attorneys for Windmill Farms, Inc.*

DATED this 10<sup>th</sup> day of July, 2018.

**WILSON. ELSE, MOSKOWITZ,  
EDELMAN & DICKER, LLP**

BY: /s/ Sheri Thome  
Sheri Thome, Esq.  
Nevada Bar No. 08657  
300 South Fourth Street, 11<sup>th</sup> Floor  
Las Vegas, NV 89101  
Telephone: 702.727-1400

and

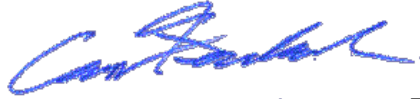
**RUBERRY, STALMACK & GARVEY,  
LLC**

Edward F. Ruberry, Esq.  
Illinois Bar No. 2411547  
Rostylaw J. Smyk, Esq.  
Illinois Bar No. 6255495  
Dennis B. Condon, Esq.  
Illinois Bar No. 6206691  
10 South LaSalle Street, Suite 1800  
Chicago, Illinois, 60603  
Tel: (312)466-8050 Fax: (312)466-8055  
[ed.ruberry@ruberry-law.com](mailto:ed.ruberry@ruberry-law.com)  
[ross.smyk@ruberry-law.com](mailto:ross.smyk@ruberry-law.com)  
[dennis.condon@ruberry-law.com](mailto:dennis.condon@ruberry-law.com)

*Attorneys for Plaintiff, Amtrust International  
Underwriters, Limited*

1 **ORDER**

2 IT IS HEREBY ORDERED that Defendant Windmill Farms, Inc.'s Answer and/or  
3 Response to the Complaint must be filed on or before August 13, 2018.

4 

5 UNITED STATES MAGISTRATE JUDGE

6  
7 DATED: August 10, 2018.

8  
9  
10  
11  
12  
13  
14 **CERTIFICATE OF SERVICE**

15 Pursuant to Fed R. Civ. P. 5(b), I certify that on the 10<sup>th</sup> day of July 2018, the foregoing  
16 Joint Motion to Extend Time for Defendant Windmill Farms, Inc. To Answer Complaint  
17 was submitted electronically for filing and service with the United States District Court of  
18 Nevada using the ECF system for notification of such filing to all the proper parties.  
19  
20

21  
22 /s/ Paul C. Ray

23 Paul C. Ray, Esq.